

Audit and Standards Committee

Date and Time - **Monday 9 December 2019 – 6:30pm**

Venue - **Council Chamber, Town Hall, Bexhill-on-Sea**

Councillors appointed to the Committee:

K.D. Dixon (Chairman), J. Barnes, Mrs M.L. Barnes, A.K. Jeeawon, Mrs E.M. Kirby-Green, L.M. Langlands, Rev H.J. Norton and H.L. Timpe.

AGENDA

1. MINUTES

To authorise the Chairman to sign the minutes of the meeting of the Audit and Standards Committee held on the 23 September as a correct record of the proceedings.

2. APOLOGIES AND SUBSTITUTES

The Chairman to ask if any Member present is substituting for another Member and, if so, to declare his/her name as substitute Member and the name of the absent Member.

3. ADDITIONAL AGENDA ITEMS

To consider such other items as the Chairman decides are urgent and due notice of which has been given to the Head of Paid Service by 12 Noon on the day of the meeting.

4. DISCLOSURE OF INTERESTS

To receive any disclosure by Members of personal and disclosable pecuniary interests in matters on the agenda, the nature of any interest and whether the Member regards the personal interest as prejudicial under the terms of the Code of Conduct. Members are reminded of the need to repeat their declaration immediately prior to the commencement of the item in question.

PART A - STANDARDS REPORTS

5. OMBUDSMAN COMPLAINTS MONITORING (Pages 1 - 4)

6. CODE OF CONDUCT COMPLAINTS MONITORING AND OTHER STANDARDS MATTERS (Pages 5 - 10)

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**Rother District Council aspiring to deliver...
an Efficient, Flexible and Effective Council, Sustainable Economic Prosperity,
Stronger, Safer Communities and a Quality Physical Environment**

7. **THE COMMITTEE ON STANDARDS IN PUBLIC LIFE'S REVIEW OF LOCAL GOVERNMENT ETHICAL STANDARDS - BEST PRACTICE RECOMMENDATIONS** (Pages 11 - 16)
8. **INDEPENDENT PERSON APPOINTMENT** (Pages 17 - 18)
9. **PARISH AND TOWN COUNCIL REPRESENTATION** (Pages 19 - 20)

PART B - AUDIT REPORTS

10. **REPORT OF THE EXTERNAL AUDITORS - ANNUAL AUDIT LETTER - TO FOLLOW**
11. **INTERNAL AUDIT REPORT TO 30 SEPTEMBER 2019** (Pages 21 - 32)
12. **TREASURY MANAGEMENT UPDATE - TO FOLLOW**
13. **WORK PROGRAMME** (Pages 33 - 34)
14. **EXCLUSION OF PRESS AND PUBLIC (EXEMPT INFORMATION)**

The following item includes material which is exempt from publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972, as amended, and it is recommended that the press and public be excluded. The relevant paragraph of Schedule 12A indicating the nature of the exempt information is stated after the item and is reproduced in full at the end of the agenda. In the circumstances of the case, it is considered that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
15. **WESTERN CAR PARK, CAMBER (PARAGRAPH 3)** (Pages 35 - 38)

Malcolm Johnston
Executive Director

Agenda Despatch Date: 29 November 2019

Invitees in respect of Standards Related Reports only:

Extract from Schedule 12A of the Local Government Act 1972 (as amended)

3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Independent Persons: Mrs Susan Fellows and Mrs Jan Gray.

Parish/Town Councillor Representatives: Councillors Mrs W.M. Miers and D. Smedley.

Rother District Council

Report to - Audit & Standards Committee
 Date - 9 December 2019
 Report of the - Executive Director
 Subject - Ombudsman Complaints Monitoring

Recommendation: It be **RESOLVED:** That the report be noted.

1. Details of the complaints made to the Local Government Ombudsman are reported to the Committee as and when they are determined throughout the year. A number of cases have been determined since the Committee's last meeting as detailed below:

Reference	Details of the Allegation	Outcome
18 009 798	<p>The complainant alleges that the Council was difficult to deal with regarding outstanding council tax payments. An arrangement was allegedly made to place their account on hold. On the same day the hold came off the account, a debt collector attended the complainant's address at 6am, demanding money with menaces. The complainant also alleges that the debt collector told them that a Council officer was going to give the order to break in to the complainant's property which is unlawful. The complainant offered £500 pounds to the debt collector but this was refused. The complainant is accusing the Council of gross injustice as his children paid with their credit cards at high APR to satisfy Rother District Council.</p>	<p>This complaint has been upheld by the Ombudsman. They have determined that the Council is at fault in the way its bailiffs carried out some elements of the enforcement action against the complainant for non-payment of council tax.</p> <p>The Council are to apologise to the complainant for the fault in the way enforcement action took place and pay £200 for distress this caused.</p> <p>The Council will also need to provide proof the Enforcement Agency has reviewed its procedures and addressed with its bailiffs what requirements must be met for a bailiff to take control of goods in line with the law and consider what policies it wishes its bailiffs to have regarding the use of body-worn cameras.</p>

18 014 348	Customer alleges that the Council's Planning and Environmental Health officers, East Sussex Building Control Partnership and an approved Building Inspector have all failed in their statutory duties relating to a commercial premises and their duty of care to the resident adjoining it. Causing 17 months of stress and substantial personal cost.	This was upheld by the Ombudsman. The Council provided the complainant with an unreserved apology for incorrectly advising that there were no breaches of planning control in August 2018. The Council also extended this apology to include the failure to pursue the environmental health investigation in the absence of the lead officer. The complainant has been assured that this has been raised with the department managers to avoid a repeat of this action, particularly when there are two or more departments working jointly on a case. The Council paid £200 to the complainant as compensation for these failures.
18 015 743	Public Space Protection Order (PSPO) formal consultation is complete. The complainant alleges that the PSPO introduced on 29 November 2018 regarding sleeping overnight in motor vehicles is not according to government guidelines and is not proportionate. He alleges that this shows that rather than the law being used fairly towards all road users, it is used in a discriminatory almost racist way towards people who live in motor homes due to high rents and lack of affordable housing both private and public. He believes it could be seen as harassment under the harassment of persons act 1997.	Withdrawn. The complainant decided not to proceed with his complaint because he acknowledges that the PSPO has not yet been adopted.
18 016 530	The complainant is aggrieved about the Council's handling of their neighbour's retrospective planning application to retain a newly-built garage. Complainant alleges: <ul style="list-style-type: none"> • it failed to take enforcement action over the garage; • it put a site notice advertising the 	This complaint has not been upheld. The Ombudsman's decision is there is no evidence of fault in the decision making.

	<p>application in a place where few people would see it;</p> <ul style="list-style-type: none"> • it did not consider the sewer beneath the new garage or contact Southern Water about the sewer. 	
<p>18 016 623</p> <p>*The subject of this complaint is identical to the complaint above and was submitted to the Ombudsman by two separate individuals and therefore treated as two separate complaints.</p>	<p>The complainant is aggrieved about the Council's handling of their neighbour's retrospective planning application to retain a newly-built garage.</p> <p>Complainant alleges:</p> <ul style="list-style-type: none"> • it failed to take enforcement action over the garage; • it put a site notice advertising the application in a place where few people would see it; and • it did not consider the sewer beneath the new garage or contact Southern Water about the sewer. 	<p>The Ombudsman will not investigate this complaint about the Council's handling of a retrospective planning application. It is unlikely they would find fault with the Council. And in any event, the alleged fault has not caused the complainant injustice.</p>
18 016 888	<p>Complainant alleges that the Council has been heavy handed, unreasonable and unfair when dealing with their lease and has cost them and other parties a considerable amount of money, and could easily have been avoided with a more considerate and consistent approach by Rother District Council.</p>	<p>The Ombudsman has discontinued the investigation because the matters are too old for them to consider and based on the evidence seen, there is no good reason to exercise their discretion.</p>
18 017 570	<p>The complainant alleges that the Council wrongly served a Community Protection Notice (CPN) in response to his neighbour's reports of antisocial behaviour. He says this has affected his reputation and caused him stress and anxiety.</p>	<p>The Ombudsman cannot investigate this complaint about the Council's issue of a CPN and its publication of information relating to this case. The complainant appealed against the notice and if he has concerns about information published by the Council he should take the matter to the Information Commissioner's Office and may claim compensation through the courts.</p>
19 001 932	<p>Complainant alleges the Council inspected their rented property for disrepair when they are taking action to evict the tenant from breach of tenancy conditions.</p>	<p>The Ombudsman would not investigate this complaint. This is because there is insufficient evidence of</p>

		fault which would warrant an investigation.
19 003 842	The complainant alleges the Council returned his council tax payments, closed its bank account, and threatened him with legal action. He wants compensation.	The Ombudsman will not investigate this complaint about the way the Council handled the complainant's council tax. This is because there is insufficient evidence of fault by the Council.
19 004 176	The complainant alleges he was unable to vote in local elections because the Council failed to arrange his postal vote.	The Ombudsman cannot investigate this complaint. The complaint is outside the Ombudsman's legal remit as the Council is not responsible for the organisation of elections. The Returning Officer organises elections and in this role, works in a personal capacity, not on behalf of the Council.

2. A Total of 11 Complaints were made to the Local Government and Social Care Ombudsman covering the period 1 June to 14 November 2019 of which:
- 2 have been upheld (Council found to be at fault)
 - 1 has not been upheld (Council not at fault)
 - 6 cannot/ will not be investigated
 - 1 has been withdrawn
 - 1 is awaiting the final decision
3. Previously the Committee asked for details in relation to non-ombudsman complaints made to the authority for the same period. There were 116 complaints made by residents from 1 June 2019 to 14 November 2019 of which:
- 77 of these were non-complaints (treated as department service request and resolved).
 - 21 were resolved at initial stage (resolving complaint with customer).
 - 1 was a stage 1 complaint (responded to formally in writing).
 - 1 was a stage 2 complaint (responded to formally by Head of Service).
 - 16 are currently awaiting determination/under investigation.

Malcolm Johnston
Executive Director

Risk Assessment Statement

There are no risks attributed to this report.

Rother District Council

Report to	-	Audit and Standards Committee
Date	-	9 December 2019
Report of the	-	Monitoring Officer
Subject	-	Code of Conduct Complaints Monitoring and Other Standards Matters

Recommendation: It be **RESOLVED:** That

- 1) the report be noted;
 - 2) the Arrangements for Dealing with Member Complaints and the Monitoring Officer Protocol be amended to include the requirement for Subject Members to respond to suggested local resolution requests within five working days; and
 - 3) the requirement for Members to complete a declaration of interest form for each declaration cease from January 2020.
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Monitoring Officer: Lisa Cooper

Introduction

1. This routine report sets out brief details of the complaints received since the Committee's last meeting held in June at which complaints were considered; as agreed by the Committee, this report will present cases on a six monthly rolling basis. It also advises the Committee of other standards related matters that have been dealt with since the Committee's last meeting.

Complaints Received

2. Since the last meeting there have been seven valid Code of Conduct complaints made against two Parish Councillors and four District Councillors. In accordance with the wishes of the Committee, as none of the complaints have resulted in an investigation and a finding of fault, these are presented anonymously. The view of our Independent Persons was sought and concurred with my proposed action in each case; details of each case are provided at Appendix 1.
3. In case C19-01, whilst the Subject Member ultimately agreed to the proposed recommended local resolution there was a delay of some nine working days; this was unnecessary, held up the timely conclusion of this complaint and caused additional administrative work in contacting the Subject Member on more than one occasion and involving their Group Leader.
4. In light of this experience, it is recommended that the time in which a Subject Member must respond to the Monitoring Officer's (MO) proposed recommended local resolution, either agreeing or not agreeing to the suggested action, needs to be clarified. It is recommended that the Subject Member is given five working days to respond to any request from the MO; failure to do so will result in a subsequent report to the Audit and Standards

Committee, whether or not the local resolution was agreed to. This requirement can be added to the Arrangements for Dealing with Member Complaints and the MO Protocol procedural documents, which is within the powers of the Audit and Standards Committee to make amendments thereto.

5. During this time I have also received five non-valid complaints. These were complaints against three District Councillors and two Parish Councillors. On four occasions (three District / one Parish) the conduct which gave rise to the complaints was carried out in their private lives (the Code only applies when conducting the business of the authority) and the other related to the actions of the Parish Council as a whole and not an individual Parish Councillor.
6. An anonymous complaint was also received from a “Mrs Taxpayer” against a District Councillor which was not entertained in accordance our procedures. Whilst a complainant can request that their identity be withheld from the Subject Member in certain circumstances, they do have to be open and transparent with the Monitoring Officer; despite contact, requesting their name and contact details no further contact was received.
7. There are no outstanding complaints at the current time.

Other Standards Matters

Training

8. As Members may be aware, within this Committee’s functions and delegations is a duty to promote and maintain high standards of conduct by Members of the Council. The following paragraphs highlight other standards matters that have taken place since the Committee’s last meeting.
9. A training session on ethics and probity took place on Thursday 25 July; the training was delivered by Hoey Ainscough Associates Ltd, a company set up in 2012 following the demise of Standards for England. As well as all Members, an invitation was extended to all parish and town clerks, the Council’s Independent Persons and the parish and town Council representatives on the Committee. Thirteen Members, one Independent Person, one Parish & Town Councillor and one Clerk and one Deputy Clerk attended. The event received mixed reviews and the Member Development Task Group considered the feedback at its September meeting and considered that this training could have been delivered in-house. The advantage of receiving training from external consultants who deal with standards matters across the country is the ability to provide numerous case studies and talk about real cases without the fear of talking about local cases; if this training is delivered in house this ability is lost.

Declarations of Interest

10. Following a number of meetings where the declarations of interest made were not clear, I sent a reminder to all Members in September requesting that when declaring interests at meetings they must state clearly to which item the interest relates as well as the nature of the interest. This not only assists Democratic Services to record declarations of interest accurately but provides for better transparency for the benefit of any members of the public present. Members were also reminded to seek my advice prior to any meeting if they

are unsure as to what they should be declaring. It is pleasing to report that a number of Members do seek my advice prior to meetings, particularly in relation to planning matters.

11. With regard to declarations of interest, it is recommended that the requirement to complete a declaration of interest form each time a Member makes a declaration ceases from January 2020. This procedure was adopted by Rother District Council when the then new Code of Conduct was first introduced back in 2002; there is no formal requirement for this form to be completed and no other East Sussex authority adopted this process. At the time it was considered that the form would assist Members in declaring and Democratic Services staff in recording interests.
12. Interests declared at all meetings are recorded and included within the Minutes. The new committee management software system provides a search facility that allows a member of the public to search the declarations of interests made by each individual Member.
13. The cessation of this process will provide a cost saving in terms of reduction on paper usage and staff administrative time both pre and post meetings. Members will need to ensure that declarations are clearly stated at meetings as there will be no paper form as a back-up.

Parish and Town Councils

14. At the request of Battle Town Council on Tuesday 16 July I provided an information session to Members of Battle Town Council on their Code of Conduct, declarations of interest and the Member Complaints process; this was well received.
15. As reported at the last meeting, following the influx of new Members to the Town and Parish Councils across the district, I can advise that there remain one or two outstanding registers of interests for newly elected or co-opted Members which are actively being pursued.

Conclusion

16. The Committee is asked to note the report, consider the proposal to agree a time limit by which a Subject Member must respond to the MO's proposed local resolution and consider the recommendation to cease using the declaration of interests form.

Mrs Lisa Cooper
Monitoring Officer

Risk Assessment Statement

The Audit and Standards Committee has a duty to promote and maintain high standards of conduct by Members and co-opted Members of the Council. Monitoring the number of complaints received and the nature of the complaints will enable the Committee to identify any trends and make recommendations for additional training and guidance as appropriate. Failure to do so could result in continued poor Member conduct, an increase in complaints administration and reputational damage for the Council.

MEMBER CODE OF CONDUCT COMPLAINTS SUMMARY SHEET

REF	DATE RECEIVED	COMPLAINANT	SUBJECT MEMBER	NATURE OF COMPLAINT, DECISION AND COMMENT
C19-01	3 July 2019	Member of the public / Manager of an Independent Living Retirement Building	Rother District Councillor	Failing to leave the managed building when asked to do so; acting in a defensive and slightly threatening manner. <u>Decision:</u> Local resolution. <u>Comment:</u> The District Councillor agreed to write a letter of apology for any distress caused and has agreed not to attend the building again. The complainant was satisfied with the local resolution.
C19-02	17 July 2019 (accepted as a valid complaint)	Member of the public representing a number of local residents	Ticehurst Parish Councillor	Alleged failure to declare a Disclosable Pecuniary Interest (DPI) at meetings when the Neighbourhood Plan was discussed. <u>Decision:</u> No further action (dismissed). <u>Comment:</u> There was no evidence to substantiate the claim that the Councillor had failed to declare a DPI and subsequently taken part in the decision making process.
C19-03	23 July 2019	Member of the public representing a number of local residents (same complainant as C19-02 above)	Ticehurst Parish Councillor	The complainant in respect of C19-02 above felt intimidated by comments made by a Councillor that were published in the Parish Council minutes. <u>Decision:</u> No further action (dismissed). <u>Comment:</u> The comments minuted were a

REF	DATE RECEIVED	COMPLAINANT	SUBJECT MEMBER	NATURE OF COMPLAINT, DECISION AND COMMENT
				statement of fact and not considered to be intimidating in any way. The Parish Council was requested to make an amendment to the Parish Council Minutes which were not factually correct with regard to C19-02 above. This was duly complied with.
C19-04	7 August 2019	Member of the public	Rother District Councillor	<p>Pre-determination evidenced by party literature and alleged failure to declare a Personal and Prejudicial Interest in a planning application as pre-determined.</p> <p><u>Decision:</u> No further action (dismissed).</p> <p><u>Comment:</u> The information provided in the party literature was a statement of fact at that time and was not attributable to an individual Member. The planning application had been subject to outline planning some three years previous; the scale and mix of development was therefore already agreed.</p>
C19-05	30 September 2019	Member of the public	Rother District Councillor	<p>Allegedly using position to confer an advantage for a close friend who was objecting to a planning application.</p> <p><u>Decision:</u> No further action (dismissed).</p> <p><u>Comment:</u> The Councillor initially attempted to call-in the application to Planning Committee but when made aware of the procedure and restraints due to relevant interests, requested a fellow Councillor to call-in the application, in accordance with the call-in procedure.</p>

REF	DATE RECEIVED	COMPLAINANT	SUBJECT MEMBER	NATURE OF COMPLAINT, DECISION AND COMMENT
C19-06	22 October 2019	Member of the public	Rother District Councillor	<p>Failure to act in accordance with s149 and s20 of the Equalities Act 2010; conspiring with a resident to garnish objections to the complainants' planning application; refusal to release emails concerning the complainant and this matter.</p> <p><u>Decision:</u> No further action (dismissed).</p> <p><u>Comment:</u> There was no evidence to substantiate claims; Councillor was performing role by advising a resident on procedure. Emails had been released.</p>
C19-07	18 November 2019	Rother District Councillor	Rother District Councillor	<p>Sent a politically motivated email to other Members on the Council from RDC email account, in addition this was during the pre-election period contrary to the Council's Code of Conduct at Paragraph 6 (2) (b) and the guidelines and restrictions placed on the Council and Councillors during this period.</p> <p><u>Decision:</u> Local resolution.</p> <p><u>Comment:</u> The Subject Member admitted the breach and was regretful; agreed to send an apology to all Members who had received the original email acknowledging the breach.</p>

Rother District Council

Report to	-	Audit and Standards Committee
Date	-	9 December 2019
Report of the	-	Executive Directors
Subject	-	The Committee on Standards in Public Life's Review of Local Government Ethical Standards – Best Practice Recommendations

Recommendation: It be **RESOLVED:** That the assessment of the Council's current practice and proposed actions against the best practice recommendations be noted and the proposed actions outlined at paragraph 6 be approved.

Monitoring Officer: Lisa Cooper

Introduction

1. At the June 2019 meeting this Committee received a report on the Committee on Standards in Public Life's (CSPL) Review of Local Government Ethical Standards and gave consideration to the resulting recommendations. (The independent CSPL advises the Prime Minister on ethical standards across the whole of public life in the UK; it monitors and reports on issues relating to the standards of conduct of all public office holders). A copy of the Review can be found at the following link:

<https://www.gov.uk/government/organisations/the-committee-on-standards-in-public-life>

2. It was noted that a detailed report would be presented to this meeting following an officer assessment of the Council's current performance against the best practice recommendations that had also resulted from the CSPL's review.
3. The Government was due to respond to the CSPL's report in September; however, to date this has not happened. However, it is known that Hoey Ainscough Associates Ltd (the organisation that delivered code of conduct training here in July) have been appointed by the Local Government Association to draw up a new national model Code of Conduct to be launched at their July 2020 conference. This is in direct response to the recommendations made by the Committee on Standards in Public Life. There will be a formal consultation with all councils on a proposed draft in the spring following initial consultations with representative bodies such as Lawyers in Local Government, Association of Democratic Services Officers etc.

Best Practice Recommendations

4. The best practice recommendations for local authorities are considered by the CSPL to be a benchmark of good ethical practice and expect that all local authorities can and should implement these.

5. Attached at Appendix A is the officer assessment against the best practice recommendations which gives detail of the current position and suggestions for improvement, where the authority falls short of the recommended best practice. It is very pleasing to note that the majority of best practice recommendations are already processes and procedures operated by this Council (10 out of 15).

6. With regard to the five that do not currently meet the best practice recommendations, it is proposed that the following action is undertaken:

Best practice 3 – it is recommended that the Council awaits the outcome of the Government's response to the CSPL recommendation that there be a new non-mandatory new model code of conduct before carrying out another review.

Best practice 5 – it is recommended that Members be reminded of the need to review their registered gifts and hospitality quarterly.

Best practice 6 – it is recommended that the Monitoring Officer carries out a review of other local authority public interest tests to see whether the Council's current documentation can be improved.

Best practice 9 – this will be adhered to as and when required.

Best practice 11 – this relates to best practice for parish and town councils; however, should a complaint be received from the Clerk concerning the conduct of a Parish / Town Councillor it will be recommended that the complaint be lodged by the Chairman of the Parish / Town Council.

Conclusion

7. It is very pleasing to note that the Council is, in the main, already operating in accordance with the majority of the best practice recommendations.

8. Members are asked to note the outcome of the CSPL's review and resulting recommendations are welcome; further reports will be made to the Committee if and when the Government brings forward any changes to legislation as a result.

Malcolm Johnston
Executive Director

Dr Anthony Leonard
Executive Director

Risk Assessment Statement

Failure to regularly review and compare to best practice guidelines could result in a missed opportunity to improve the ethical standards and procedures at Rother District Council.

Best Practice Recommendations for local authorities

Best Practice Recommendation	Current Position	Action Required / Comment
<p>Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.</p>	<p>The Committee considered and recommended this amendment to the Council's Code of Conduct at the June meeting which was subsequently adopted by full Council on 8 July 2019.</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation, and prohibiting trivial or malicious allegations by councillors.</p>	<p>The Committee considered and recommended this amendment to the Council's Code of Conduct at the June meeting which was subsequently adopted by full Council on 8 July 2019.</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.</p>	<p>The Code of Conduct has been reviewed once in 2015 since being adopted in 2012. This was undertaken by way of an officer desk-top review and report to Committee; no amendments were proposed.</p> <p>It is recommended that the Council awaits the Government's response to the CSPL's recommendation that a new model code be provided before undertaking a further review.</p>	<p>Action: None at present - await the Government's response to the CSPL's recommendation.</p>
<p>Best practice 4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.</p>	<p>A copy of the Code of Conduct was sent to all Councillors following the elections in May 2019. It forms part of the Constitution and is published on the website as well as being on its own dedicated page: http://www.rother.gov.uk/article/369/Members-Code-of-Conduct</p>	<p>None – Council meets best practice recommendation.</p>

Best Practice Recommendation	Current Position	Action Required / Comment
	A hard copy is also available within the Council's Community Help Points for reference.	
<p>Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.</p>	<p>Currently there is no legal requirement for local authorities to maintain a gift and hospitality register, nor for individual Councillors to register or declare gifts. However, at RDC Councillors are required to provide details of any person from which they have received a gift or hospitality to the value of at least £50. These details are included within the current Register of Interests, as "other interests" and published on individual Councillors' webpages.</p>	<p>Councillors are reminded at the start of each civic year to undertake a review of their Register of Interest; this is considered sufficient at the current time, considering that it is not mandatory to collect the data, in order to capture any additions to their register in this regard.</p> <p>Action: Propose to remind Members quarterly of the need to review Register of Interests and Gifts and Hospitality.</p>
<p>Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.</p>	<p>The Council's Arrangements for Dealing with Member Complaints document sets out when it is likely that a complaint will not be investigated.</p>	<p>Action: Propose to carry out a review of other local authority public interest tests to see whether the Council's can be improved / made clearer in a simple statement.</p>
<p>Best practice 7: Local authorities should have access to at least two Independent Persons.</p>	<p>The Council has had three IPs since July 2017; currently in the process of maintaining three, following the resignation of one IP in August this year. Report elsewhere on this Agenda reporting on the recruitment process and recommended appointment.</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.</p>	<p>The IPs are consulted on each allegation received, including those that are dismissed as being without merit.</p>	<p>None – Council meets best practice recommendation.</p>

Best Practice Recommendation	Current Position	Action Required / Comment
<p>Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.</p>	<p>Since the introduction of the Localism Act and the new regime, the Council has not made a decision on an allegation of misconduct following a formal investigation.</p>	<p>Best practice guidelines will be adhered to, if and when required.</p>
<p>Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.</p>	<p>The Council already publicises guidance and the Arrangements for Dealing with Member Complaints on the website at the following link:</p> <p>http://www.rother.gov.uk/article/369/Members-Code-of-Conduct</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.</p>	<p>This is a matter for the Parish / Town Councils across RDC. This recommendation has been brought to the attention of all Clerks and will be confirmed should such a complaint be received.</p>	<p>None.</p>
<p>Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.</p>	<p>The MO has a good working relationship with Parish and Town Clerks across the district with regard to the standards regime and manages the complaints process within the principal council's remit on behalf of the parish and town councils.</p> <p>The MO is well supported corporately when fulfilling these functions and has access to training and development and MO forums.</p>	<p>None – Council meets best practice recommendation.</p>

Best Practice Recommendation	Current Position	Action Required / Comment
<p>Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.</p>	<p>The MO does not carry out any investigations; all complaints that are referred for investigation are out-sourced to an external independent investigator. The MO Protocol sets out the process for the appointment of an Investigating Officer.</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 14: Councils should report on separate bodies they have set up or which they own as part of their annual governance statement, and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness, and publish their board agendas and minutes and annual reports in an accessible place.</p>	<p>The Council's 2018 Annual Governance Statement (AGS) provides information on separate bodies that have been set up; for example the Limited Company set up in respect of the Colonnade that was subsequently disbanded in 2019 and reported in the 2019 AGS.</p>	<p>None – Council meets best practice recommendation.</p>
<p>Best practice 15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.</p>	<p>Executive Directors meet regularly with Group Leaders where standards related matters can and are discussed. All Councillors are part of an established political group on the Council. Relevant issues are discussed with the MO.</p>	<p>None – Council meets best practice recommendation.</p>

Rother District Council

Report to	-	Audit and Standards Committee
Date	-	9 December 2019
Report of the	-	Monitoring Officer
Subject	-	Independent Person Appointment

Recommendation to COUNCIL: That Mrs Rose Durban be appointed as an Independent Person in accordance with Chapter 7, Section 28 of the Localism Act 2011, for a term of four years commencing from 17 December 2019.

Monitoring Officer: Lisa Cooper

Introduction

1. As Members will recall at the last meeting held on 23 September, the Committee was advised of the need to appoint an Independent Person (IP) following the resignation of one of the Council's three IPs.
2. The Committee agreed that the Chairman of the Committee and an Executive Director together with the Monitoring Officer comprise a panel to interview the suitable applicants and make a recommendation, via this meeting of the Audit and Standards Committee and then on to full Council on 16 December 2019.

Publicity

3. The Independent Person vacancy was advertised by way of a press release, the Council's website and promoted via social media and MyAlerts, as well being notified to all Councillors and all Parish and Town Councils within the Rother area. Each applicant was provided with a recruitment pack that set out the Role Profile and Person Specification.

Selection and Interview Panel

4. At the closing date (18 October), eight applications had been received and four candidates were shortlisted for interview, held on 30 October and 5 November 2019. The expectations of the role in terms of regular attendance at meetings and contributions to committee discussions on standards matters were explained to each applicant at interview.
5. The decision of the Panel is outlined below in order that the Committee can then make a recommendation to full Council on 16 December 2019. The calibre of the applicants was extremely high and it was a difficult decision to make.

Appointments

6. Having interviewed a number of very good candidates, the Panel are confident to recommend that Mrs Rose Durban be appointed to serve as one of the Council's Independent Persons.

Conclusion

7. Following the recruitment process to appoint an Independent Person, the Committee is asked to recommend to Council that Mrs Rose Durban's name be put forward for approval by the full Council on Monday 16 December.

Lisa Cooper
Democratic Services Manager and Monitoring Officer

Risk Assessment Statement

Failure to appoint an additional Independent Persons will result in a lack of continuity and a missed opportunity to work alongside the existing Independent Persons whose terms of office expire in July 2021.

Rother District Council

Report to	-	Audit and Standards Committee
Date	-	9 December 2019
Report of the	-	Monitoring Officer
Subject	-	Parish and Town Council Representation

Recommendation: It be **RESOLVED:** That the revised make-up of the Committee be noted and the newly appointed Parish and Town Council representative, Councillor David Smedley, be welcomed to the Committee.

Monitoring Officer: Lisa Cooper

Introduction

1. Following the resignation of Councillor Alan Stainsby as of 30 September 2019, this report advises on his replacement.
2. Alan Stainsby was first appointed to the Council's Standards Committee in December 2007 as a Parish / Town Council representative and had remained a constant Member of it and its successor Committee since that time. The Chairman of the Committee has written to Alan, following his resignation to thank him, on behalf of Rother District Council, for his contribution to the standards regime across the district during his time.

Parish / Town Council Representation

3. At the Rother Association of Local Council meeting held on 23 October 2019, Councillor David Smedley, Icklesham Parish Council, was appointed to the current vacancy created by Alan's resignation. It is noted that unfortunately he is unable to attend this meeting due to a prior engagement (Parish Council meeting).
4. As Members are aware, Rother District Council is the principle authority for the 32 Parish and Town Councils across Rother and as such, is responsible for elements of the Standards regime, including the "arrangements" that are put in place for the determination of complaints and the registration of parish councillors' interests.
5. As a reminder, the role of the Parish and Town Council representatives co-opted onto the Audit and Standards Committee are to make sure that the Parish and Town Councils are represented throughout discussions and to give a Parish and Town perspective that may not otherwise be known by the other Members serving on the Committee.
6. The two Parish and Town Council representatives, namely Mrs Wendy Miers (Dallington Parish Council) and David Smedley (Icklesham Parish Council) are able to attend the June and December meetings as a Member of the

Committee for the Part A items. At these meetings they can speak on all matters but not vote.

Conclusion

7. Members are asked to formally note the resignation of Alan Stainsby and welcome Councillor Smedley as the newly appointed Parish and Town Council representative to the Committee.

Lisa Cooper
Democratic Services Manager and Monitoring Officer

Risk Assessment Statement

There are no risks associated with this report.

Rother District Council

Report to	-	Audit and Standards Committee
Date	-	9 December 2019
Report of the	-	Executive Director
Subject	-	Internal Audit Report to 30 September 2019

Recommendation: It be **RESOLVED:** That the Internal Audit report to 30 September 2019 be noted.

Audit Manager: Gary Angell

Introduction

1. The Council is required to ensure that it has reliable and effective internal control systems in place. The adequacy of these systems is tested by both Internal and External Audit.
2. The Council's Internal Audit Service operates in accordance with the Public Sector Internal Audit Standards. It is a requirement of these Standards that we report to the Audit and Standards Committee on audit matters and any emerging issues not only in relation to audit, but also to risk management and corporate governance.

Current Position

3. Owing to a combination of audit overruns and other circumstances beyond our control, overall progress on the 2019/20 Audit Plan is slightly behind target at present, meaning that some of the planned audits may not be carried out this financial year. For example, it has not been possible to perform the planned health check of the U4BW ERP Computer System because some of the system is still being built. At least one other audit may also have to be put on hold due to timing issues.
4. On a more positive note, the annual Governance Audits are now well underway and the Internal Audit Team is making good progress. This means that it may be possible to recoup some time to undertake other planned work assuming no major issues are found.

Summary of Activity to 30 September 2019

5. Three audit reports were issued in the quarter. Two of these provided good or substantial assurance on the overall governance arrangements. However, the third report (Car Park Income) only provided limited assurance. An overview of the findings arising from all three audits is given in Appendix A.
6. The Car Park Income audit received a limited rating owing to the issues found with the operation of the Western Car Park, Camber. The precise nature of the audit findings are the subject of a separate confidential report elsewhere on this agenda.

7. Work on four other audits (Housing Allocations, Property Investment, Community Infrastructure Levy (CIL) and Software Licensing) was also at an advanced stage on 30 September 2019 and the reports should be issued soon.

Implementation of Audit Recommendations

8. Each quarter, Members are updated on the progress made on implementing the audit recommendations reported at previous meetings. Appendix B shows a summary of the current position.
9. From this it can be seen that all recommendations issued to date in the current financial year have been implemented. However, progress on the older year recommendations has been quite slow this quarter with a total of 13 recommendations still outstanding (i.e. 3 in 2017/18 and 10 in 2018/19). All cases where there has been no movement in the past six months have therefore been brought to the attention of the Executive Directors for further action.
10. At the last meeting, Members expressed concern that three recommendations from 2017/18 were still outstanding and they requested a progress update at the next meeting. This information is provided in Appendix C. In summary, progress is now being made to address all of these issues although none have so far been resolved.

Malcolm Johnston
Executive Director

Risk Assessment Statement

A strong, independent and well supported Internal Audit function ensures that the Council does not suffer from poor internal control systems.

HMO LICENSING AUDIT

ROTHER DISTRICT COUNCIL

Head of Service: Richard Parker-Harding

Officer(s) Responsible for Implementing Recommendations: Cathy Beaumont and Sam Smith

Overall Level of Assurance: **SUBSTANTIAL**

Purpose and Objectives

The purpose of the audit is to provide organisational and departmental management with an assurance as to the adequacy of the control systems based on compliance with the control objectives set out in the table below.

These objectives are designed to assess the extent to which the organisation meets its legal requirements, its own needs and those of its stakeholders and how the control systems in place contribute to the overall governance arrangements and securing value for money from the Council's services and operations.

Control Objectives

The audit opinion is based on the extent of compliance with the objectives (below), which have either been met in full (**M**), partially met (**P**) or not met (**N**).

Licensing Scheme – There is a proper system in place for HMO licensing.	M
Registration – The Council maintains a register of all licensed HMOs and all licensing applications are promptly processed. Measures are also in place to identify unlicensed properties.	M
Licence Fees – Applicants for HMO licences pay the correct fee.	M
Inspection and Monitoring Arrangements – All HMO properties are inspected prior to the issue of a licence to ensure that all relevant conditions have been met. Existing HMOs are monitored to ensure continued compliance.	P
Enforcement – The Council has an enforcement policy for properties which do not comply with HMO legislation and action taken by officers is proportionate and applied consistently.	M

Level of Assurance

Based on the findings from the audit, we have determined that substantial assurance can be given on the governance arrangements.

The only noteworthy issue found relates to the record keeping. Whilst it would appear that licences are being correctly issued and evidence of compliance is being obtained or followed up, this information is not always captured on the M3 computer system. It is important that all such information is entered on (or uploaded to) this system to ensure that the Council maintains a complete, accurate and up-to-date record of all HMO activity.

Executive Summary

Overall, the control objectives are considered to have largely been met, but we have made one medium and one low risk recommendation to management to further enhance the governance arrangements

Internal Audit Service
August 2019

ROTHER DISTRICT COUNCIL**JOINT WASTE CONTRACT – CENTRAL ADMIN AUDIT**

Service Manager: Madeleine Gorman

Overall Level of Assurance: **GOOD**

Introduction

A Joint Waste and Beach and Street Cleaning Service was procured by Eastbourne, Hastings, Rother and Wealden Councils and the contract was awarded to Kier Services Limited in October 2012. The contract commenced at Eastbourne and Wealden on 1 April 2013, Hastings on 2 July 2013, and Rother on 1 April 2014 and was originally due to run until 31 March 2023, but was terminated early by mutual agreement and actually ended on 28 June 2019.

A replacement contract with another provider has since come into force, but this audit concentrates on the final months of the Kier contract.

Rother District Council was approved as the Administering Authority in May 2012 and the Joint Waste Team (also known as the Partnership Client Unit) are employed to fulfil this role. The Joint Waste Team provides the principal point of contact for the Partnership and handles all invoices, communications, documentation, notices and materials relating to the contract.

Purpose & Objectives

The purpose of the audit is to review the work carried out by Rother in its role as the Administering Authority and to provide assurance to the whole Partnership on the adequacy of its control systems based on compliance with the control objectives set out in the table overleaf.

These objectives are designed to assess the extent to which the Joint Waste Team meets both its own needs and those of its partner authorities and how the control systems in place contribute to the overall governance arrangements and secure value for money from the Council's services and operations.

The control objectives, key risks and expected controls in the report were devised by Rother but all have been shared with the partner authorities and their Internal Audit teams given an opportunity to comment on and influence the scope of the review.

Limitations on Audit Coverage

The audit solely focuses on the Joint Waste Team and the adequacy of its procedures in relation to the outgoing Kier contract. It includes a review of the final payments made to Kier and the apportionment of all remaining costs across the Partnership.

The report is not intended to provide any assurance on the day-to-day operational management of the contract at any of the partner authorities. It is the responsibility of

the Internal Audit team at each authority to review the adequacy of its own Contract Compliance Team.

Control Objectives

The audit opinion is based on the extent of compliance with the objectives (below), which have either been met in full (M), partially met (P) or not met (N).

Contract – The contract has been formally agreed by all partner authorities and the contract documentation is complete.	M
Payment to Contractor – The Administering Authority ensures that all contract payments are correct and within the authorised budget.	M
Financial Contributions from Partner Authorities – All partner authorities promptly pay the Administering Authority for their share of the contract costs plus all additional expenditure directly attributable to them.	M
Performance Monitoring – The Administering Authority monitors the operational and financial performance of the whole contract and regularly updates the partner authorities and the Joint Waste Committee on how well it is operating.	M

Level of Assurance

Based on the findings from the audit we have determined that good assurance can be given on the governance arrangements as no significant issues were found.

Executive Summary

Overall, the control objectives are considered to have been met and it was not necessary to make any formal recommendations to management as a result of this audit.

Internal Audit Service
September 2019

CAR PARK INCOME AUDIT

ROTHER DISTRICT COUNCIL

Head of Service: Joe Powell

Officer(s) Responsible for Implementing Recommendations: Deborah Kenneally, Lynsey Goodwill and Hayley Cornford

Overall Level of Assurance: **LIMITED**

Purpose and Objectives

The purpose of the audit is to provide organisational and departmental management with an assurance as to the adequacy of the control systems based on compliance with the control objectives set out in the table below.

These objectives are designed to assess the extent to which the organisation meets its legal requirements, its own needs and those of its stakeholders and how the control systems in place contribute to the overall governance arrangements and securing value for money from the Council's services and operations.

Control Objectives

The audit opinion is based on the extent of compliance with the objectives (below), which have either been met in full (**M**), partially met (**P**) or not met (**N**).

Cash Collection Contract – The Council’s car park cash collection arrangements are covered by a suitably worded contract.	M
Other Car Park Income Contracts – The collection of car park income via mobile phone apps, card payments made at the machines and/or any other on site arrangements are covered by suitably worded contracts.	N
Income Collection and Security – All approved car parking charges are collected, the income accounted for, and recovery action taken in respect of unpaid standard charge notices. Arrangements exist to ensure the security of cash collected, and the safety of staff.	P
Contract Payments – All contract payments are correct.	M
Budgetary Control – All income and expenditure is correctly accounted for and the budget monitored and controlled.	M

Level of Assurance

Based on the findings from the audit we have determined that only limited assurance can be given on the overall governance arrangements owing to the number and nature of the issues found.

The key findings are as follows:

- **Western Car Park, Camber** – Issues were raised during the audit over the use of ANPR (Automatic Number Plate Recognition) cameras for enforcement purposes. This will be the subject of a separate report to the Audit and Standards Committee.

- **All Pay and Display Car Parks** – There is no signed contract in place with Cobalt Technologies for use of the RingGo app. This issue was also raised at the last audit in August 2017.

Executive Summary

Overall, the control objectives are considered to have only been partially met. We have made four medium and three low risk recommendations in order to improve the governance arrangements.

This audit has been given a 'Limited' assurance rating owing to the issues found with the operation of the Western Car Park, Camber. It should be noted, however, that controls over all other car park income, including penalty income, are operating satisfactorily.

Internal Audit Service
September 2019

Summary of Progress on Recommendations Made up to 30 June 2019

Audit Recommendations 2017/18 and 2018/19

Previous quarter's performance shown in brackets

Risk	Issued	Implemented	Work-in-Progress	Not Started
High	5	5 (5)	0 (0)	0 (0)
Medium	77	66 (62)	8 (10)	3 (5)
Low	58	56 (51)	1 (3)	1 (4)
Total	140	127 (118)	9 (13)	4 (9)
		90.7% (84.3%)	6.4% (9.3%)	2.9% (6.4%)

Breakdown of outstanding audit recommendations for 2017/18 and 2018/19 by Head of Service:

Robin Vennard (Resources)

- Data Protection – issued 22/09/17 (1 Medium, 1 Low)] See Appendix C for
- ICT Governance 2017/18 – issued 06/04/18 (1 Low)] progress update
- Procurement – issued 05/10/18 (2 Medium)
- Council Tax – issued 04/01/19 (1 Medium, 1 Low)
- ICT Network Security – issued 16/01/19 (1 Low)
- Creditors – issued 12/03/19 (1 Medium)
- ICT Governance 2018/19 – issued 12/04/19 (3 Medium)
- Payroll – issued 18/04/19 (1 Medium)

Audit Recommendations 2019/20 (up to 30 June 2019)

Risk	Issued	Implemented	Work-in-Progress	Not Started
High	0	0	0	0
Medium	5	5	0	0
Low	2	2	0	0
Total	7	7	0	0
		100%	0%	0%

Position Update on Outstanding 2017/18 Audit Recommendations – Issue 1 (Document Retention Policy)

Data Protection Report – issued 22/09/17					
Ref	Finding/Risk	Recommendation	Risk Rating	Summary of Progress to Date	Current Position
1.3	<p>Finding</p> <p>The Council does not currently have a document retention policy which is consistent across the whole authority.</p> <p>Risk</p> <p>Data is not up-to-date or is retained longer than necessary leading to a breach in Data Protection legislation.</p>	<p>The Data Protection Officer (DPO) should chase the relevant Heads of Service for the outstanding information in order to finalise and implement a corporate-wide document retention policy.</p>	Low	<p>This recommendation was originally directed at a former DPO who had started the process of creating a corporate-wide document retention policy. However, not all Service areas provided sufficient information to move this matter forward and the DPO who initiated this approach has since left the authority. Responsibility for the role of DPO has now passed to the ICT Manager.</p> <p>The recommendation has been partly addressed by the many privacy notices placed on the Rother website as part of General Data Protection Regulation (GDPR) compliance. However, whilst all such notices include a data retention element, they do not provide any guidance on the retention of specific documents (e.g. receipt books, contracts, employee records, etc) as this is not their purpose. Consequently, some managers remain unclear how long how these items should be kept.</p> <p>In May 2019, the Assistant Director Resources confirmed that an overarching retention policy was being written to include specific service based retention requirements.</p>	<p>Work-in-progress</p> <p>The following progress update was received from the Assistant Director Resources on 15/11/19.</p> <p>“The document retention periods are set out in the Council Privacy Statements, as shown on the Council’s website. The Assistant Director Resources will progress with Heads of Service for those areas of business not covered by these and will incorporate into an overarching document which details the principles of information management. This work will need to be managed within the many conflicting priorities of the Council’s services. As such it is unlikely to be completed before the end of 2020.”</p>

Position Update on Outstanding 2017/18 Audit Recommendations – Issue 2 (Data Protection Training)

Data Protection Report – issued 22/09/17					
Ref	Finding/Risk	Recommendation	Risk Rating	Summary of Progress to Date	Current Position
1.4	<p>Finding Staff refresher training was last held in March 2017 but at least one fifth of the workforce never attended.</p> <p>Risk Human error is the main reason for data breaches and a thorough training programme is essential to reduce the risk of data loss and consequential reputational damage and financial penalties.</p>	<p>All staff should be required to attend regular data protection training and the DPO should maintain a list (and run additional sessions as necessary) to ensure 100% attendance.</p> <p><u>Note</u> – The need to be able to demonstrate that all staff are receiving regular data protection training is now more important than ever following the introduction of GDPR.</p>	Medium	<p>The implementation of this recommendation has also been delayed because it was originally directed at a former DPO.</p> <p>Some GDPR training has since been provided but only for a limited number of staff.</p> <p>Earlier this year, the new DPO stated that Rother would be providing online compulsory training via an existing online provider. However, this plan fell through when it was found that the contract with the provider only covered Wealden DC shared staff.</p> <p>The DPO has since referred the matter to Human Resources to source a corporate solution.</p>	<p>Work-in-progress</p> <p>The following progress update was received from the ICT Manager on 11/11/19.</p> <p>“All GDPR training is currently being sourced by the HR Manager.”</p> <p>A verbal update was also obtained from the HR Manager on 13/11/19.</p> <p>This confirmed that the HR Manager has been working on sourcing a corporate training solution since October 2019. Three different providers have been considered and the preferred solution has now been chosen.</p> <p>The new system will be used to provide mandatory data protection training and should be rolled out to all staff and Members at some point in the New Year.</p>

Position Update on Outstanding 2017/18 Audit Recommendations – Issue 3 (Off-Site Disaster Recovery Exercise)

ICT Governance Report (2017/18 Review) – issued 06/04/18					
Ref	Finding/Risk	Recommendation	Risk Rating	Summary of Progress to Date	Current Position
2.2	<p>Finding</p> <p>No off-site disaster recovery exercises have taken place for several years and recent staff turnover has seen a reduction in the number of staff with practical experience in this area.</p> <p>Risk</p> <p>Disaster recovery arrangements are inadequate resulting in an inability to reinstate key services within a reasonable timescale/adverse publicity.</p>	<p>An off-site disaster recovery exercise should be carried out to provide assurance that all essential services can be recovered.</p>	Low	<p>A further off-site disaster recovery exercise is yet to take place.</p> <p>The recommendation was originally rated as a medium risk. This has since been downgraded to low risk following improvements made to the structure and resilience of the Rother ICT network. However, the Council still needs to be confident that it can recover from a major disaster involving loss of hardware (e.g. fire damage) and only an off-site disaster recovery exercise will confirm this.</p> <p><u>Note</u> - The Council has a contract with ADAM Continuity Ltd to provide a mobile disaster recovery facility and replacement hardware in the event of a major disaster. Rother ICT staff would then be responsible for re-building the ICT systems from scratch using servers hosted remotely and security backups. This is what needs to be tested.</p>	<p>Work-in-progress</p> <p>The following progress update was received from the Assistant Director Resources on 15/11/19.</p> <p>“A disaster recovery exercise is scheduled once the current Email Exchange server migration is complete. We have engaged ADAM (our offsite disaster recovery support) for Friday 15 November 2019 to scope the exercise. This is needed to reflect the changes in the Council’s infrastructure and how systems are deployed.”</p>

AUDIT AND STANDARDS COMMITTEE

WORK PROGRAMME 2019 - 2020	
DATE OF COMMITTEE	SUBJECT
Monday 9 December 2019	<p>Part A – Standards Reports</p> <ul style="list-style-type: none"> • Code of Conduct Complaints Monitoring • Local Government Ombudsman Complaints Monitoring and Annual Review 2018-2019 • Review of Local Government Ethical Standards – Assessment of the Council’s Best Practice • Appointment of a Parish/Town Council Representative • Appointment of an Independent Person <p>Part B – Audit Reports</p> <ul style="list-style-type: none"> • BDO – Annual Audit Letter 2018-19 • Internal Audit Report to 30 September 2019 • Annual Risk Management Update • Treasury Management Update Report • Governance at Camber Sands • Car Park Income Audit
Monday 23 March 2020	<p>Part A – Standards Reports (none scheduled)</p> <p>Part B – Audit Reports</p> <ul style="list-style-type: none"> • Grant Thornton – Grant Claim Certification for the year ended 31 March 2019 • Grant Thornton – Audit Plan 2019-20 • Internal Audit Report to 31 December 2019 • Internal Audit Plan 2020-21 • Review of Internal Audit 2019-20 • Treasury Management Report • Accounting Policies 2019/20
WORK PROGRAMME 2020 – 2021	
Monday 22 June 2020	<p>Part A – Standards Reports</p> <ul style="list-style-type: none"> • Code of Conduct Complaints Monitoring • Ombudsman Complaints Monitoring <p>Part B – Audit Reports</p> <ul style="list-style-type: none"> • Internal Audit Report to 31 March 2020 • Treasury Management Report – 2019/20 Outturn
Wednesday 29 July 2020	<p>Part A – Standards Reports (none scheduled)</p> <p>Part B – Audit Reports</p> <ul style="list-style-type: none"> • Grant Thornton – Annual Governance Report 2019/20 • Statement of Accounts 2019/20 • Treasury Management Report
ITEMS FOR CONSIDERATION	

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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